

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Rosemary Spell  
**Title:** Executive Director

**REQUEST:** Joint Parties' First Set of Discovery

**DATED:** December 23, 2003

**ITEM:** Joint Parties 1-3 For each Verizon wire center in Massachusetts, please provide the following information for the wire center in electronic spreadsheet form (i.e., as an Excel Spreadsheet):

- a. The UNE pricing zone;
- b. The Special Access Zone Density Pricing zone;
- c. The MSA the wire center predominately serves;
- d. The LATA the wire center predominantly serves;

**REPLY:**

- a., c., d. Please see the attached file (Attachment MA JP 1-3).
- b. Please see National Exchange Carrier Association, Inc. Tariff FCC No. 4, Section 33.

**Verizon New England Inc.  
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**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Rosemary Spell  
**Title:** Executive Director

**REQUEST:** Joint Parties' First Set of Discovery

**DATED:** December 23, 2003

**ITEM:** Joint Parties 1-4 Provide in electronic spreadsheet form (i.e., as an Excel Spreadsheet) Verizon's total switched access lines in service in Massachusetts at the end of the most recent quarter for which such information is available, stated separately by wire center and state-wide.

**REPLY:** Please see the attached file (Attachment MA JP 1-4) that contains data as of June 30, 2003. The information provided in the attachment is proprietary, confidential and competitively sensitive, and is being provided in accordance with the terms of the Department's Protective Order.

VZ # 209

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Rosemary Spell  
**Title:** Executive Director

**REQUEST:** Joint Parties' First Set of Discovery

**DATED:** December 23, 2003

**ITEM:** Joint Parties 1-7 Using the following table, identify separately for each Verizon wire center for the most recent quarter for which the data is available, the number of end-user customer locations by the number of analog switched local service lines with regard to end-user customers using 24 or fewer analog UNE loops, split between residential and business end-user customers.

<b>Lines</b>	<b>Number of Customer Locations Residential</b>
<b>1</b>	
<b>2</b>	
<b>3</b>	
<b>4</b>	
<b>5</b>	
<b>6</b>	
<b>7</b>	
<b>8</b>	
<b>9</b>	
<b>10</b>	
<b>11</b>	
<b>12</b>	
<b>13</b>	
<b>14</b>	
<b>15</b>	
<b>16</b>	
<b>17</b>	

<b>18</b>	
<b>19</b>	
<b>20</b>	
<b>21</b>	
<b>22</b>	
<b>23</b>	
<b>24</b>	

<b>Lines</b>	<b>Number of Customer Locations Business</b>
<b>1</b>	
<b>2</b>	
<b>3</b>	
<b>4</b>	
<b>5</b>	
<b>6</b>	
<b>7</b>	
<b>8</b>	
<b>9</b>	
<b>10</b>	
<b>11</b>	
<b>12</b>	
<b>13</b>	
<b>14</b>	
<b>15</b>	
<b>16</b>	
<b>17</b>	
<b>18</b>	
<b>19</b>	
<b>20</b>	
<b>21</b>	
<b>22</b>	
<b>23</b>	
<b>24</b>	

**REPLY:**

Verizon MA does not have information regarding whether UNE loops are being used by CLECs to serve residential or business customers. Please see the attached file (Attachment MA JP 1-7) for data as of October 2003. The information provided in the attachment is proprietary, confidential and competitively sensitive, and is being provided in accordance with the terms of the Department's Protective Order.

**Verizon New England Inc.  
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**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:**

**Title:**

**REQUEST:** Joint Parties' First Set of Discovery

**DATED:** December 23, 2003

**ITEM:** Joint Parties 1-8 Separately for each carrier you maintain meets the self-provisioning trigger standard established in the ***Triennial Review Order*** in any geographic market within the Verizon operating territory in Massachusetts, provide the total number of minutes (including both voice and data) exchanged within the past year, by switch, split between:

- a. Minutes that originated from Verizon retail customers and were delivered to the CLEC switch; and
- b. Minutes that originated from CLEC retail customers and were delivered to the Verizon switch.

**REPLY:** Verizon MA objects to this Information Request on the grounds that it is overbroad, unduly burdensome, and/or seeks information that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Data regarding the number of minutes of traffic delivered between Verizon MA's switches and CLEC switches is beyond the scope of the analyses at issue in the Department's review of Verizon MA's triggers cases.

**Verizon New England Inc.  
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**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** John Livecchi

**Title:** Director – Network Engineering

**REQUEST:** Joint Parties' First Set of Discovery

**DATED:** December 23, 2003

**ITEM:** Joint Parties 1-9 For the most recent time period that such information is available, provide the total number of Verizon loops in Massachusetts, and by central office (by applicable CLLI code), that are served by:

- a. IDLC arrangements;
- b. NGDLC arrangements;
- c. UDLC arrangements;
- d. Of the IDLC loops, please state how many loops are transferable to spare copper or universal digital loop carrier (UDLC) without additional construction.

**REPLY:**

- a. Please see the attached file (Attachment MA JP 1-9), Column C for the data on the number of loops served by IDLC. The information provided in the attachment is proprietary, confidential and competitively sensitive, and is being provided in accordance with the terms of the Department's Protective Order.
- b. The information requested is not readily available and would require a burdensome special study. Verizon MA uses Next Generation Digital Loop Carrier technology (NGDLC) as a generic term to describe terminal equipment that evolved in the industry from legacy digital loop carrier products, such as SLC 96, to a next generation of loop electronics technology and applications. NGDLC products are generally designed to support higher subscriber counts and bandwidths, fiber feeder designs, and the capability to allocate individual channel banks within the same system for integrated or universal

operation. Although there are enhanced capabilities of the GR-303 application that is available with NGDLC technology, Verizon MA has not generally deployed this in the network. GR303 requires the implementation of a unique suite of Operations Support Systems in order to enable the use of GR303 capability within the network. Verizon MA's deployment of NGDLC technology utilizes the interfaces that support the functions of IDLC and UDLC. Therefore, lines provisioned over NGDLC technology are tracked as DLC lines by Verizon MA.

- c. Please see the attached file (Attachment MA JP 1-9), Column D for the data on the number of loops served by UDLC. The information provided in the attachment is proprietary, confidential and competitively sensitive, and is being provided in accordance with the terms of the Department's Protective Order.
- d. The information requested for "how many [IDLC] loops are transferable to spare copper or UDCL without additional construction" is not readily available and would require a burdensome special study. In Massachusetts, 0.5% of Verizon MA access lines are served from terminals fed solely by IDLC, and would not have existing, parallel copper or UDLC facilities available.

**Verizon New England Inc.  
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**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:  
Title:**

**REQUEST:** Joint Parties' First Set of Discovery

**DATED:** December 23, 2003

**ITEM:** Joint Parties 1-10 For the most recent time period that such information is available, provide the total number of Verizon UNE loops, and by central office (by applicable CLLI code), that are served by IDLC and NGDLC arrangements in Massachusetts that have been provided to a CLEC with unbundled local switching.

**REPLY:** Verizon MA objects to this Information Request on the grounds that it is overbroad, unduly burdensome, and/or seeks information that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. In addition, the information requested is not readily available and would require a burdensome special study that would entail an extensive manual review.



**Verizon New England Inc.  
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**Docket No. 03-60**

**Respondent:  
Title:**

**REQUEST:** Joint Parties' First Set of Discovery

**DATED:** December 23, 2003

**ITEM:** Joint Parties 1-11 For the most recent time period for which such information is available, provide the total number of Verizon UNE loops, and by central office (by applicable CLLI code), that are served by IDLC and NGDLC arrangements in Massachusetts that have been provided to a CLEC without unbundled local switching.

**REPLY:** Verizon MA objects to this Information Request on the grounds that it is overbroad, unduly burdensome, and/or seeks information that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. In addition, the information requested is not readily available and would require a burdensome special study that would entail an extensive manual review.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:**

**Title:**

**REQUEST:**

Joint Parties' First Set of Discovery

**DATED:**

December 23, 2003

**ITEM:** Joint Parties 1-12

Provide a forecast for the next five years, or the longest available forecast if a five-year forecast is not available, identifying the number of loops that you intend to serve in Massachusetts via:

- a. IDLC loop arrangements;
- b. NGDLC loop arrangements.

**REPLY:**

Verizon MA objects to this Information Request on the grounds that it is overbroad, unduly burdensome, and/or seeks information that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

VZ # 217

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Rosemary Spell  
**Title:** Executive Director

**REQUEST:** Joint Parties' First Set of Discovery

**DATED:** December 23, 2003

**ITEM:** Joint Parties 1-13 For the most recent quarter for which such information is available, provide the:

- a. Total number of UNE-P lines in Massachusetts, and by central office (by applicable CLLI code);
- b. Total billed revenues for unbundled local switching, shared transport and any charges for call detail record/access records billed UNE-P carriers in Massachusetts;
- c. The number of shared transport (i.e., transport used in conjunction with unbundled local switching) minutes originating from each central office in Massachusetts; and
- d. The number of shared transport minutes terminating to each central office in Massachusetts.

**REPLY:**

- a. Please see attached file (Attachment MA JP 1-13). The information provided in the attachment is proprietary, confidential and competitively sensitive, and is being provided in accordance with the terms of the Department's Protective Order.
- b.- d. Verizon MA objects to parts b., c. & d. of this Information Request on the grounds that these questions seek information that is overbroad, unduly burdensome, not relevant to the triggers analyses at issue in this proceeding, and/or is not reasonably calculated to lead to the discovery of admissible evidence.

**Verizon New England Inc.  
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**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Rosemary Spell  
**Title:** Executive Director

**REQUEST:** Joint Parties' First Set of Discovery

**DATED:** December 23, 2003

**ITEM:** Joint Parties 1-14 For each state in your region, provide the information requested in Part II (Wireline and Fixed Wireless Local Telephone) to the FCC's Form 477 (Local Competition and Broadband Reporting Data Request) with data as of September 2003.

**REPLY:** Verizon MA objects to this Information Request to the extent that the request seeks information concerning Verizon operations outside of Massachusetts that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, Verizon MA responds as follows:

Please see Verizon MA's reply to the JP Document Request 1-1.

**Verizon New England Inc.  
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**Docket No. 03-60**

**Respondent:** Rosemary Spell  
**Title:** Executive Director

**REQUEST:** Joint Parties' First Set of Discovery

**DATED:** December 23, 2003

**ITEM:** Joint Parties 1-15 Separately for each geographic area in Massachusetts in which Verizon claims the self-provisioning trigger standard established in the ***Triennial Review Order*** has been met, identify all wire centers in that geographic area.

**REPLY:** Please see the attached file (Attachment MA JP 1-15).

VZ # 220

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** Rosemary Spell  
**Title:** Executive Director

**REQUEST:** Joint Parties' First Set of Production of Documents

**DATED:** December 23, 2003

**ITEM:** Joint Parties 1-1 Provide, for each state in your region, a copy of the completed Part II (Wireline and Fixed Wireless Local Telephone) to the FCC's Form 477 (Local Competition and Broadband Reporting Data Request) with data as of June 2003.

**REPLY:** Verizon MA objects to this document request to the extent that the request seeks documentation concerning Verizon operations outside of Massachusetts that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, Verizon MA responds as follows:

Please see the attached file (Attachment MA JP POD 1-1) which contains a copy of Verizon's Form 477 filing with June 2003 data for Part II (Wireline and Fixed Wireless Local Telephone) for Verizon MA. The information provided in the attachment is proprietary, confidential and competitively sensitive, and is being provided in accordance with the terms of the Department's Protective Order.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:  
Title:**

**REQUEST:** Joint Parties' First Set of Production of Documents

**DATED:** December 23, 2003

**ITEM:** Joint Parties 1-2 Provide all written reports, studies and other documents forecasting the number of loops Verizon intends to serve in Massachusetts via IDLC loop arrangements and or NGDLC loop arrangements within the next five years

**REPLY:** Verizon MA objects to this document request on the grounds that the request seeks information that is not relevant to the triggers analyses at issue in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Verizon MA further objects to this request on the basis that it calls for speculation and or conjecture.

VZ # 222